

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>08-654</u>
v.	:	DATE FILED: _____
RONALD HILLS	:	VIOLATIONS:
SHEREE GETER-HILLS	:	18 U.S.C. § 2113(d) (armed bank robbery
APRIL RICHARDSON	:	- 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute cocaine – 1 count)
	:	18 U.S.C. § 924(c) (carrying a firearm
	:	during and in relation to a crime of
	:	violence - 1 count)
	:	18 U.S.C. § 924(c) (possession of a firearm
	:	in furtherance of a drug trafficking crime
	:	- 1 count)
	:	18 U.S.C. § 922(g)(1) (possession of a
	:	firearm by convicted felon - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 18, 2008, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**RONALD HILLS and
APRIL RICHARDSON**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and
abetted the taking, from employees of the National Penn Bank, 9 West Evergreen Avenue, lawful
currency of the United States, that is, approximately \$900 belonging to, and in the care, custody,

control, management and possession of the National Penn Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and in so doing, defendants HILLS and RICHARDSON knowingly and unlawfully assaulted and put in jeopardy the lives of employees of the National Penn Bank, by use of a dangerous weapon, that is, a handgun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 18, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

RONALD HILLS

knowingly carried a firearm, that is, a silver colored semi-automatic pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 22, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RONALD HILLS and
SHEREE GETER-HILLS**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, five grams or more, that is approximately 14 grams, of a mixture and substance containing a detectable amount of cocaine base ('crack'), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 22, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

RONALD HILLS

knowingly possessed a firearm, that is, a black Llama 45 cal. semi-automatic pistol, serial number 07-04-08343-98, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the possession with intent to distribute cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 22, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

RONALD HILLS,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a black Llama 45 cal. semi-automatic pistol, serial number 07-04-08343-98, loaded with six live rounds.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 922(g)(1) and 924(c), set forth in this indictment, defendant

RONALD HILLS

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offenses, including, but not limited to:

1. a black Llama 45 cal. semi-automatic pistol, serial number 07-04-08343-98;
2. Six rounds of 45 caliber ammunition; and
3. One magazine for the Llama .45 caliber pistol.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

LAURIE MAGID
Acting United States Attorney